

CONFORMITY ANALYSIS

Introduction

The Regional Transportation Improvement Program (RTIP) is the federally required short-range document that implements the long-range Regional Transportation Plan (RTP). The biennial RTIP update is produced on an even year cycle. This RTIP cycle is consistent with the State Transportation Improvement Program (STIP) cycle. The 2006 STIP in the Southern California Association of Governments (SCAG) region was incorporated into the 2006 RTIP for conformity analysis. The Federal Highways Administration (FHWA) and Federal Transit Administration (FTA) approved the 2006 RTIP on October 2, 2006.

Project Description

RTIP Amendment 06-11 includes one non-exempt project (see project listing). The project included in the amendment is located within the Ventura County portion of the South Central Coast Air Basin (SCCAB); therefore this conformity determination is being made for that basin. Amendment 06-11 relies on the regional emissions analysis for the 2004 RTP, as amended, and the 2006 RTIP.

Federal Requirements

Federal and state regulations allow that SCAG, as the designated Metropolitan Planning Organization (MPO), may rely on a previous regional emissions analysis when processing amendments, in the event that certain conditions are met. Section 93.122(g) is the relevant part of the Transportation Conformity rule for this amendment.

Conformity Status of Current RTIP and RTP

On June 7, 2004, the federal conformity determination for the 2004 RTP was issued for the following non-attainment and maintenance areas:

- South Coast Air Basin (SCAB – Ozone, CO, NO₂, and PM₁₀)
- San Bernardino County portion of the Mojave Desert Air Basin (MDAB – PM₁₀)
- Coachella Valley portion of the Salton Sea Air Basin (SSAB - PM₁₀)
- Imperial County portion of SSAB (Ozone and PM₁₀)

The federal conformity determination of the RTP for the Ventura County portion of the South Central Coast Air Basin (ozone) and the Southeast Desert Modified ozone area was issued by the federal agencies on June 16, 2004. The effective date for the conformity determination for the entire SCAG 2004 RTP, including all of the air basins is June 7, 2004.

On October 2, 2006, the federal agencies approved funding and determined conformity of the 2006 RTIP. The federal funding approval of the 2006 RTIP will expire on October 2, 2008. The 2006 RTIP is based on the 2004 RTP and implements the projects and programs included in the fiscal years (2006/07 – 2011/2012) of the 2004 RTP.

On May 12, 2005 a federal conformity determination was issued for the 2004 RTP and RTIP for those areas designated as non attainment under the 8-hour Ozone standard.

On March 30, 2006 a federal conformity determination for the 2004 RTP was issued for the South Coast Air Basin, which is designated as non attainment for PM_{2.5}.



Summary of the 2006 RTIP Regional Emissions Analyses

The project in Amendment 06-11 is from the 2004 RTP, which is a conforming Plan. Amendment 06-11 does not include any new regionally significant projects beyond those currently included in the 2004 RTP, nor does it move a project from any modeling horizon year currently assumed in the 2004 RTP and 2006 RTIP. Furthermore, the design, concept and scope of the project do not differ significantly from what was described in the 2004 RTP. Allocating funds to this project will not delay the implementation of projects in the 2004 RTP or 2006 RTIP.

The 2006 RTIP is consistent with the 2004 RTP and the regional emissions analyses for the 2006 RTIP updates the regional emissions analyses for the 2004 RTP. As such, SCAG is using the conformity analysis for the 2006 RTIP. The regional emissions analysis methodology for this amendment to the 2006 RTIP uses two sets of calculations. For pollutants with emissions budgets, the currently applicable budget is used to determine conformity. There are no approved budgets for PM_{2.5} in SCAB, PM₁₀ in the Mojave portion of San Bernardino County and for Ozone and PM₁₀ in Imperial County. Until the budgets are approved the build/no build tests and less than base year test for PM_{2.5} is used for analysis.

For Ventura only the budget test applies; see table on page 4.

Reaffirmation of 2006 RTIP Conformity Test

SCAG reaffirms the applicable conformity findings for the 2006 RTIP, which can be found at:

http://www.scag.ca.gov/RTIP/final06/final_RTIP_vol2of3_Sec02_jul06.pdf

This reaffirmation covers the findings for all applicable pollutants, including regional emissions analyses, financial constraint test, timely implementation of Transportation Control Measures (TCMs), applying the use of the latest planning assumptions and the latest approved emissions model (EMFAC2002), reaffirming consistency between the adopted 2006 RTIP and the adopted 2004 RTP, and reaffirming the process for interagency consultation and public participation.

The regional emissions analysis for the amendment was performed with the SCAG Regional Transportation Model used for the 2004 RTP and 2006 RTIP and utilizes the planning, socioeconomic and model assumptions from the 2004 RTP and 2006 RTIP. A summary of the regional emissions analysis (conformity finding) is tabulated below.

Conformity Findings

SCAG has completed its analysis of the proposed changes to the 2006 RTIP. SCAG's findings for the approval of this amendment are as follows:

Overall

Statement of Fact: Inclusion of this amendment in the 2006 RTIP would not change any other policies, programs and projects which were previously approved by the federal agencies on October 2, 2006.



Finding: SCAG has determined that the 2006 RTIP Amendment 06-11 is consistent with all federal and state requirements and complies with the federal conformity regulations.

Regional Emissions Analysis – South Central Coast Air Basin (SCCAB)

Finding: The 2006 RTIP Amendment 06-11 regional emissions for Ozone precursors (NOx, ROG) are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years (2004 Ozone SIP)

Timely Implementation of TCMs

Only two non attainment areas in the SCAG region currently have TCMs, the Ventura County portion of the SSCAB and the SCAB. In the SCAB, the list of TCMs and the Timely Implementation Report used to track implementation of TCMs is comprehensively updated with each RTIP cycle. The most recent list of TCMs can be found in the 2006 RTIP.

Finding: The 2006 RTIP Amendment 06-11 does not change timely implementation of SCCAB TCM projects. Any past obstacles to timely implementation of TCMs identified in Amendment 06-11 have been overcome. All SCCAB TCM projects in the federally approved conforming 2006 RTIP are given funding priority and are on schedule for implementation.

Fiscal Constraint Analysis

Finding: RTIP Amendment 06-11 includes the most recent financial plan for the 2006 RTIP. All projects listed in the 2006 RTIP (including the proposed amendment) are financially constrained for all fiscal years.

Interagency Consultation and Public Involvement Analysis

Finding: The prior regional conformity analysis leading to FHWA and FTA's approval on October 2, 2006 complied with all federal and state requirements for interagency consultation and public involvement as documented in Section V of Technical Appendix II of the 2006 RTIP. For RTIP Amendment 06-11 SCAG will undergo additional public involvement including solicitation via email for comments from the Transportation Conformity Working Group. In addition, Amendment 06-11 will be posted on SCAG's website (www.scag.ca.gov) for a 30-day public comment period.



Regional Emissions Analysis – South Central Coast Air Basin (SCCAB)

The South Central Coast Air Basin (SCCAB) includes all of Ventura County and is within the jurisdiction of the Ventura County Air Pollution Control District (VCACPD).¹

OZONE – SUMMER (8HR)

<u>ROG</u>	<u>YR 2010</u>	<u>YR 2020</u>	<u>YR 2030</u>
2006 RTIP	10.650	6.170	4.170
BUDGET	14.300	14.300	14.300

<u>NOx</u>	<u>YR 2010</u>	<u>YR 2020</u>	<u>YR 2030</u>
2006 RTIP	15.080	6.830	4.370
BUDGET	21.400	21.400	21.400

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than budget

¹ The emissions analysis provided is based on the 2006 RTIP.

